### AFFIDAVIT

ereby swear and affirm the following:

My resume is attached. am a Ph.D. in economics.

dnjury cases, based on peer-reviewed studies in the academic economic literature on Willingness-To-Pay to save statistical lives. These studies are based on what people statistical lives. These studies are based on what people willing to pay to reduce the risk of death, and what workers are willing to accept as payment for accepting such bask on the job. This methodology has been widely accepted and published in the peer-reviewed economic literature for everyal decades in economic journals of the highest quality. Phave calculated the loss of enjoyment of life in personal

Mom my personal knowledge, many of my fellow economists nationwide also testify in count as expert witnesses using this basic methodology.

Toss of enjoyment of life damages in parsonal injury cases from be calculated with a reasonable degree of economic certainty. These estimates can provide valuable assistance to a jury in determining intangible losses for a given ondividual. An example of an acceptable method to calculate duct damages can be found in Economic/Hedonic Damages: A suctice Book for Plaintiff, and Defense Attorneys, and Supplements thereto, by M. D. Brookshire and S. V. Smith, Chaderson Publishing Co., Cinn., Ohio, 1990.

Disagreements among aconomists in the forensic field in this parea regarding these calculations do not materially difference the many disagreements that exist over methodologies in other areas of economic testimony, such as valuing businesses, calculating worklife for injured workers, husinesses, calculating worklife for injured workers, etc. estimating discount rates for present value purposes, etc. where diversity of expert economic opinion has long been accepted in courts of law.

day of December, 15 this 1/2

LINDA M. SHEEHY, Notary Public My Commission Expires March 20, 200

Allan S. McCausland, Ph.D.

Telephone: (603) 746-5820

CURRENT POSITION: Arbitrator/Economic Consultant

McCaustand Economic Associates 834 Main Street, P.O. Box 248 Contoocook, New Hampshire 03229

McCausland Economic Associates is a consulting firm specializing in three areas:

Arbitration, Mediation and Fact-Finding Services
 Analysis of Economic Damages and Expert Winess Work
 Financial Consulting Services

### EDUCATION

Ph.D. in Economics, Clark University, Wortester, Massachusetts M.A. in Economics, Whittemere School of Business and Economics, University of New Hampshire, Durbam, New Hampshire B.A. with High Honors, American International College, Springfield, Massachusetts

# PROFESSIONAL ACTIVITY

Active ArbitratorfMediatorFact-Finder in the Private and Public Sectors Active Speaker/Panelist Cansultant to Law Firms egistered Investment Advisor (1983-1999) rolessor of Economics and Finance (1969-1983) inancial Consultant

### MEMBERSHIPS

National Academy of Arbitrations
National Association of Businass Economists
National Association of Forensic Economists
National Association of Forensic Economists
Northeast Business and Economic Association American Economic Association

#### PANELS

American Arbitration Association's Multiemployer Pension Plan Amendments Act Panel Federal Mediation & Conciliation Service's Malional Roster of Arbitrators New Hampshire Public Employee Board's List of Neutrals Massocia Vermont Public Employee Board's List of Neutrals
Numerous Individual Private & Public Collective Bargaining Agreements
Defense Logistic Agency's Grievance and EEO Pancis (1984-1990)
FAANNATCO-New England Region Panci of Arbitrators (1988-1993) American Athitration Association's National Panel of

> Page 1 of 4

onal Academy of Arbitrators
onal Science Foundation Fellow
cron Delta Epsilon National Honor Society in Economics
i Mu Delta Marional Honor Society in Business Administration
a Chi National Honor Society
saluatorian (American International College)

a voluntariori in transferori di Salutanori Collego)
1s Listi
1s Listi
1s Vide in American Colleges and Universities (1967)
1s Raculty Award, New Hampslitte College (1979-80)

aculy Award, New Hampshire College (1

SENTATIONS (1980-Present)

ing & Litigating Business Value and Profits. New Hampshire Trial Lawyers Association, Civil & Family Seminar, March, 1996

Cease in Arbitration Cases, Sixth Annual Public Sector Labor Seminar, Manchester, New Hampshire, maker, 1995

i<mark>giton of Teacher Dispues.</mark> New Hampshire/NEA Leadership Conference, Nonth Conway, New Hampshire. 1985

EWhole Remediest. The Diguisca Employes, National Academy of Arbitrators Forty-Eighth Annual ing San Francisco, California, May, 1995

Z Local Economies, Taxes and Public Sector Bargaining, American Arbitration Association Conference is and Properties of Woods, New Hampalite, July, 1994

Worklife Estimates: Not for Use in Personal Injury and/or Wrongful Death Litigations, Eastern Economic Infan Meeting, Issues in Forensic Economics II, Boston, Massachusetts, March, 1994 reston to Avoid Litterion, Institute for Management Accounting, Manchester, New Hampshire, February,

edy the Economy & Heath Issues on LaborManagement Relations, American Arbitration, Association, egylexachusetts, June, 1991

whing an Arbitration Case, Advanced Arbitration Advocacy Conference, American Arbitration Association, and Association, Application Association, and Associatio

live Preparation for Facilinding, American Arbitration Association Seminar, Fairlee, Vermont, September,

inding. Presentation and Weight of Evidence. New Hampshire School Board Association Workshop.

Abenbul Testing and Impairment Issues, American Arbitration Association Conference, Boston, objectits, December, 1989

Objectits, December, 1989

Objectits, December, 1989

Objectits, December, 1989

Objectits, New Hampshire/NEA Workshop, Hanover, New Hampshire, August, 1989

Court and Internation, New Hampshire Bar Association-Continuing Legal Education Program eding Future Costs of Treatment, New Hampshire Bar Association-Continuing Legal Education Program regard Representing the Victims of Head Injury, Manchester, New Hampshire, April, 1989

OD Separation Confedency Testing, New England Regional Arbitration Conference, University of Induseus, Amirest, Massaciusectis, May, 1988

lo general de la Mediator, Impasse Resalution New Hampshire School Boards Association Labor de Horischop, Manchester, New Hampshire, January. 1988

# PRESENTATIONS (1980-Present) - Continued

- -<u>Arbinability,</u> Public Sector Labor Refations in New Hampshire, Public Employes Labor Relations Board Conference, State of New Hampshirt Symposium, Manchesler, New Hampshire, May, 1987
- -Fundamental Mönetary Cycle of Investments, Personal Fluancial Planning for Lawyers, The New Hampshire Bar Association 1986 Annual Meeting, Bretton Woods, New Hampshire, June, 1986
- <u>-Mediation to Fact-Finding.</u> Regional meeting of UniSery Directors of the National Education Association, Kenneburk, Maine, May, 1985
- Exports, Imports and Jobs. Eastern Regional meeting of the National Academy of Arbitrators, April, 1984, and Western Massachusetts, October, 1984
- -Discussant, <u>Equity Sharing to Promate Regidential Sales</u>, Northeast Business and Economic Association, Boston, Massachusetts, November, 1984
- Use of Economic Data in Facilinding. American Arbitration Association Conference, North Conway, New Hampshire, November, 1984
- Arbitration Workshop, American Arbitration Association Conference, Boston, Massachusetts, July, 1984
- <u>Assessing Affirmative Action Progress.</u> New England Business and Economic Association Conference, Harford, Connecticut, November, 1982
- A Workshert for Mediation, American Arbitration Association Conference, Manchester, New Hampshire, November, 1982
- -Aspects of Evidence and Proof. American Arbitration Association Conference, Woodstock, Vermant, May, 1982. Discussant, Effect of Government Policy on Employment and Income, Western Economic Association. Conference, San Francisco, California, July, 1981
- Use and Mis-use of the Consumer Price Index in Collective Bargaining. New England Regional Utility Conference, North Conway, New Hampshire, June, 1981
- -Forezating Interest Rates. New Hampshire Society of Certified Public Accountants, Manchester, New Hampshire, April, 1981
- -Use of Economeirics in Forcesting. New Hampshire Society of Certified Public Accountants, Manchester, New Hampshire, Fall 1980

Company and Paperworkers, Local 499. Commerce Clearing House, Inc.'s, Tabor Arbitation Awands" publication, ber 6, 1996, 6428, Pages 8226-8230.

& Harman Refining Division, Attleboro, MA and United Plant Guard Workers of America Local 541, The Bureau of National I packs, 'Labor Relations Reporter' publication, August 28, 1996, 106LA993-1056.

<u>1 Bedood, NH Police Department and State Employees Association of New Hampshire,</u> The Bureau of National Affairs, Inc.'s, ReButons Reporter' publication, August 21, 1996, 106LA967-970.

(NE) School District and Convax Education Association and Conway Education Support Personnel, NEA-New Hamoshire. canol National Affairs, Inc.'s, "Labor Relations Reporter" publication, May 29, 1996, 106 LA 385-448, and Commerce Pipuse, Inc.'s, "Labor Arbitration Awards" publication, August 13, 1996, 6256, Pages 7331-7333. hole and Statutory Remedier. The Displaced Employee, Arbitration 1995; New Challenges and Expanding Responsibilities, car of National Affairs, Inc., pages 191-205.

k<mark>hie Estimates. Not for Use in Personal Iniury and/or Wrongfel Death Litigation, Maine Lawyers Review, Volume 3, s., March 15, 1995.</mark>

iszik Corporation/United Paper Workers international, Local 200, Commerce Clearing House, Inc. 15, "Labor Arbitration publication, October 18, 1994, 94-2 ARB|4483

rek County Corrections Deal, and State Employees Association. The Bureau of National Affairs, Inc.'s, "Labor Relations of patienters 14, 1994, 102LA1088-1096.

NOTO COUNTY Commissioners IN H.1 and AESCIME Local 2715. The Burrau of National Affairs, Inc.'s, "Labor Relations Coloiblication, March 2, 1994, 1011, A1033-1064, also published by Commerce Clearing House, "Labor Arbitration Awards" of May 17, 1994, 94-1 ARB|4221.

inguistional Security Services. Inc. and Guard Workers, Local 538. Commerce Clearing House, "Labor Arbitration Awards" to Cocober 26, 1991, 93-2 ARBJ3504, also published by The Bureau of National Affairs, Inc. 3, "Labor Relations Reporter" et 4, 1991, 101LA441.

NEI) School District and Convey Education Association. American Arbitration Association's "Arbitration in the Schools" in December 1, 1991.

ed Grocers of Maine and Teamsters Union, Local No. 340. Commerce Creating House Inc.'s, "Labor Arbitration Awards" o<u>ns</u> September 10, 1991, 91-2 ARB18437.

388 and City of Holvelce. Commerce Clearing House, "Labor Arbitration Awards" publication, March 12, 1991, 91-1.
 37d American Arbitration Association's "Labor Arbitration in Government" publication, May 15, 1991 Vol. 21, No. 5.

<mark>Abbe and Maine State Employees Association</mark>, Commerce Clearing House Inc.'s "Labor Arbitration Awards" publication, 1851 1990, 90-2 ARBIBSEL.

Athol (NAA) and International Brotherhood of Police Officers. <u>Local 415</u>, American Arbitration Association's "Labor oppin Covernment" publication, September 15, 1988.

TRECOVETY COM, and Teamsters. Local 6393, Commerce Clearing House, Inc.'s "Labor Arbitration Awards" publication, 31,7988.

effor (NH) School District/AFSCME Council 23, Local 1801, American Arbitation Association's "Arbitation in the Schools" off February 1, 1987.

ek NHD School District/Netional Education Association-New "Labor Arbitration Information System" publication, October Edifferingsch Educational Support Staff, Labor Relations Press "Labor Arbitration Information System" publication, October

# PUBLICATIONS - Continued

Town of Goffstown (NHIVAFSCME Council 93, Local 2715, American Arbitration Association's "Labor Arbitration in the Government publication, April 15, 1986. Boisc Cascade, Corporation/United Paperworkers International Union, Local 900, American Arbitration Association's "Summary of Labor Arbitration Awards" publication, October 15, 1985.

<u>North Smithfield (RI) School Committee North Smithfield Association of Support Smif Personne UNational Education Association-</u> <u>Rhode Island</u>, American Arbitration Association's "Arbitration in the Schools" publication, September 1, 1985.

Bolse Cascade Corporation/United Paperworkers International Union, Local 900, Commerce Charing House, July 22, 1985.

Using Statistics to Assess Affirmative Action, Papers and Proceedings, New England Business and Economic Association, Fall 1982 Sex Discrimination; By Whom?, The Reporter, Fall 1981

The Ripple Effect (Q in Minimum, Wage Legislation, Atlantic Economic Journal, Volume III, No. 4, page 96 (December 1979) (also presented at the Allantic International Economic Conference, Vienna, Austria, April 1979)

Minimum Wese Employment Effects in New England. 1950 through 1972. Papers and Proceedings, New England Business and Economic Development Conference, Hardord, Connecticut, 1976

The Fair Labor Standards Amendments of 1975 (H.R. 10130). FAIR LABOR. STANDARDS AMENDMENTS OF 1975, Hearings before the Subcommittee on Labor Standards of the Committee on Education and Labor, House of Representatives, Mincty-Fourth Congress, pages 246-248, November 1975.

# PREVIOUS PROFESSIONAL EXPERIENCE

1983-Present

Azbitrator/Economic Consultant, McCausland Economic Associates

Professor Economics and Finance

New Hampshire College

Manchester, New Hampshire

Duties: Taught Investments, Security Analysis, Labor Economics, Labor Relations and Arbitration, Introduction to Economics.

Company of New Hampshire for the development of Labor Stopply Availabilities for minorities and for statistically assessing progress in the Company & Affirmative Action? Program. Special Economic Consultant to Public Service

Case 2:08 v-042 7-NKL

Chalman: Management Arts and Economic Sciences Department, New Hampshire College

Dulies: Supervised faculty, students and curtculum development in the following majors. Economics, Fluance, Fashion Merchandising, Holef/Resort Management, Marteling. Retail Management, and Techna-Business.

Associate Consultant, New England Economic Project Aided in the development of a New England Forecasting Model and advised the Directors in pullry decisions concerning the Project's

Document 188

Adjunct Professor of Investments and Personal Finance, Merrimack Valley Branch, University of New Hampshire, Manchester, New Hampshire

Duties: Developed curriculum and taught Investments and Personal Finance.

Assistant Professor of Economics and Finance

Coardinator: Economics and Finance Area New England College, Henniker, New Hampshire

Filod 12/01/09

Duties: Taught Investments, Labor Economies, Labor Relations and Arbitration, Internediate Micro and Macro Economics, and introduction to Economics.

# COURT APPEARANCES AS AN ECONOMIC EXPERT

#### MAINE

Federal District Court of Maine, Portland and Bangor, Maine
- Business Lost Income and Sales, Business Vainations
- Economic Losses Resulting from Personal Injury, Defamation and Wrongful Discharge/Discrimination

State of Maine Superior Court: Cumberland, Kennebec, Knox, Oxford and Sagadahoc Counties

— Business Valuations

— Economic Losses Resulting from Personal Injury

## MASSACHUSETTS

Federal District Court of Massachusetts, Boston, Massachusetts

— Business Log Income and Sales, Business Valuations

— Economic Losses Resulting from Personal Injury and Wrougful

Discharge/Discrimination

Slate of Massachusetts Superior Courts: Esser, Middlesex, Norfolk, Pymouth, Suffolk and Worcester Counties — Economic Sesses Resulting from Personal Injury — Littlied Partnership Valuations

## NEW HAMPSHIRE

Federal District Court of New Hampshire, Concord, New Hampshire

— Business Lost Income and Sales, Business Valuations

— Economic Losses Resulting from Personal Injury, Wrongful

Discharge/Discrimination and Wrongful Death

State of New Hampshire Supetior Courts: Cheshire, Coox, Grafton, Hillsboro, Merrinack, Rockingham, Strafford, and Sullivan Counties—Business Lost Income and Sales, Business Valuations—Economic Losses Resulting from Personal Injury, Wrongful Death and Wrongful Discharge/Discrimination

#### VERMONT

State of Vermont Superior Court: Orange County
- Economic Losses Resulting from Wrongful Discharge

\* This is a list of the courts in which I have testified. I have testified in many of these courts numerous times on the same issues.